Since the plaintiff has **failed to file proof of service or obtain a default judgment** within the required deadlines under **California Rules of Court (CRC) 3.740**, you have strong grounds to either:

Option 1: File a Motion to Dismiss (Best if you were never properly served)

Basis: The plaintiff did not file **proof of service** within **180 days** or obtain a **default judgment** within **360 days**, as required under **CRC 3.740(d)-(f)**.

Steps to Draft & File a Motion to Dismiss

1. **Download Form PLD-050 (Notice of Motion to Dismiss)**
    - California Courts PLD-050 Form
2. **Fill Out the Motion**
    - **Case Number:** 24CHLC44199
    - **Court:** Los Angeles Superior Court, Chatsworth (Dept. F41)
    - **Grounds for Dismissal:**
        - "Plaintiff failed to file proof of service within 180 days as required under CRC 3.740(d)."
        - "Plaintiff failed to obtain a default judgment within 360 days as required under CRC 3.740(f)."
        - "The court issued an OSC for these failures, confirming noncompliance."
3. **File the Motion with the Court**
    - Submit to: **Chatsworth Courthouse (9425 Penfield Ave, Chatsworth, CA 91311)**

- Serve a copy on the plaintiff's attorney (check the Complaint for their address).

4. **Attend the OSC Hearing (11/19/2025) and Argue for Dismissal**
    - Bring a copy of the docket showing no proof of service or default judgment.

Option 2: File an Answer (Best if you want to dispute the debt on the merits)

Use this if you prefer to fight the case rather than dismiss it on technical grounds.

Steps to Draft & File an Answer

1. **Download Form PLD-C-010 (General Denial – Collections Case)**
    - California Courts PLD-C-010 Form
2. **Fill Out the Answer**
    - Check the box for **"General Denial"** (if the Complaint is not verified).
    - **Affirmative Defenses (Optional but Recommended):**
        - "Plaintiff lacks standing—no valid assignment of debt."
        - "Statute of limitations has expired (4 years for written contracts)."
        - "Defendant was not properly served."
3. **File the Answer with the Court**
    - Submit to the **Chatsworth Courthouse** before the OSC hearing.

Which Option Should You Choose?

Motion to Dismiss	Answer
Best if plaintiff **never served you properly** or missed deadlines.	Best if you want to **fight the debt claim directly**.
Could get the case **dismissed with prejudice** (cannot be refiled).	Keeps the case alive but lets you argue defenses.
Faster resolution.	Requires more litigation.

Recommended Next Steps

1. **If you were never properly served** → File a **Motion to Dismiss (PLD-050)**.
2. **If you want to challenge the debt itself** → File an **Answer (PLD-C-010)**.
3. **Either way, attend the OSC hearing on 11/19/2025** to argue your position.